UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Environmental Sciences Center
701 Mapes Road
Fort Meade, Maryland 20755-5350

SEMS DocID 2343387

DATE: 6/2/2020

SUBJECT: Region III Data QA Review

FROM: Eric Graybill
Region III ESAT RPO (3LS20) Non-responsive based on revised scope

TO: DEBORAH LINDSEY
Hazardous Site Cleanup Division (HSCD)

Attached is the data validation report for the WEIRTON BOP IMPLOSION SITE site for DAS# R35754; SDG# EMSL04 completed by the Region III Environmental Services Assistance Team (ESAT) contractor, ICF International, under the direction of Region III LSASD.

If you have any questions regarding this review, please call Eric Graybill at (410)-305-2665.

Attachment

cc: Non-responsive based on revised scope

TO: #0002 TDF: #0520008

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ICF
ESAT Region 3
US Environmental Protection Agency Environmental Science Center
701 Mapes Road Ft. Meade, MD 20755-5350
Phone 410-305-3012

Date: May 19, 2020

To: ESAT Region 3 Project Officer

From: Non-responsive based on revised scope
Validator

Non-responsive based on revised scope
Reviewer

Subject: Inorganic Data Validation (S4VM)
Weirton BOP Implosion
R35754 EMSL04

Overview

This data package consisted of nineteen (19) soil samples, including two (2) field duplicate pairs, analyzed for asbestos utilizing polarized light microscopy (PLM).

Analyses were performed by EMSL Analytical, Inc. (EMSL). The samples were submitted to the laboratory directly by the sampling contractor. The laboratory indicated analyses were performed according to Test Method for the Determination of Asbestos in Bulk Building Materials, EPA/600/R-93/116 July 1993, with milling prep.

Data were validated according to the USEPA PLM Validation Process Guidelines for Asbestos Data Review and with guidance from the National Functional Guidelines for Inorganic Superfund Methods Data Review and are assigned the Superfund Data Validation Label S4VM (Stage_4_Validation_Manual).

The following validation narrative is an evaluation of laboratory reported data based on the electronic data package received by Region 3 on May 7, 2020.

An Electronic Data Deliverable (EDD) was provided by the laboratory. It was protected and could not be modified by the validator. No EDD is provided with this data validation report.

Summary

No data quality outliers or technical deficiencies were identified that would require rejection of sample results. Missing Refractive Index (RI) Liquid Calibration required estimation of sample results.

Minor Problem

The RI Liquid Calibration was not included in the data package. Visual Estimation and Point Count Limits of Quantification (LOQs) are estimated and have been qualified "UJ".

Notes

Mill preparation can reduce fiber size. While allowable to homogenize samples under the method, care must be taken to discontinue as soon as the material appears homogenous. This cannot be evaluated through the data package. No data were qualified based on this finding.

Asbestos fibers classified as chrysotile by the laboratory were detected in trace amounts in visual estimation of sample SS-12. The result for this sample was below the LOQ in point counting.

Data for field duplicate pairs SS-03/SS-04 and SS-13/SS-14 were comparable. No asbestos fibers were detected in either analysis.

For the laboratory duplicate analysis performed on sample SS-12, results were comparable (both results were below the LOQ in point counting). For the laboratory duplicate analyses performed on samples SS-01 and SS-07, no asbestos fibers were detected in any sample pair. No data were qualified based on laboratory precision.

Laboratory blanks associated with the samples in this SDG were free of asbestos.

Microscope alignment verification is present and shows proper alignment.

Reference sample analysis and fiber identification criteria for the visual examination trace results were reviewed by the validator and found to be accurate and consistent.

Glossary of Inorganic Data Qualifier Codes

Validation Qualifiers	In order of descending precedence. Only one of these qualifiers may apply to any result.
R	The data are unusable. The sample results are rejected due to serious deficiencies in meeting QC criteria. The analyte may or may not be present in the sample.
UJ	The analyte was analyzed for, but was not detected. The reported quantitation limit is approximate and may be inaccurate or imprecise.
U	The analyte was analyzed for, but was not detected above the level of the reported sample quantitation limit
B	The result is presumed a blank contaminant. This qualifier is used for drinking water samples only.
J	The result is an estimated quantity. The associated numerical value is the approximate concentration of the analyte in the sample.
J+	The result is an estimated quantity, but the result may be biased high.
J-	The result is an estimated quantity, but the result may be biased low.

R35754_EMSL04_042004637_03-05-20_soil_PLM.xlsm

National Asbestos Data Entry Spreadsheet (NADES) for Bulk & Soil Analysis by PLM

Lab Name: EMSL04
Lab Job No: 042004637

Analyzed by: [redacted]
Analysis date: 3/5/2020

Data Entry by: [redacted]
Data Entry Date: 3/9/2020

QA by: [redacted]
QA Date: 3/10/2020

Client Sample Number	Index Suffix Char.	Index Suffix No.	QA Type (a)	Lab Sample Number	Mineral Type (b)	OPTICAL PROPERTIES								Comments
						Morph	Fiber Color	Sign Elong. (+/-)	Pleoch (Y/N)	Angle Extinct.	Ref. Index α (parallel)	Ref. Index γ (perpendicular)	Biref.	
SS-01			Not QA	042004637-0001										AB 3/5/2020
SS-02			Not QA	042004637-0002										AB 3/5/2020
SS-03			Not QA	042004637-0003										AB 3/5/2020
SS-04			Not QA	042004637-0004										AB 3/5/2020
SS-05			Not QA	042004637-0005										AB 3/5/2020
SS-06			Not QA	042004637-0006										AB 3/5/2020
SS-07			Not QA	042004637-0007										AB 3/5/2020
SS-08			Not QA	042004637-0008										AB 3/5/2020
SS-09			Not QA	042004637-0009										AB 3/5/2020
SS-10			Not QA	042004637-0010										OA 3/5/2020
SS-11			Not QA	042004637-0011										OA 3/5/2020
SS-12			Not QA	042004637-0012	CH	W	C	+	N	P	1.551	1.557	L	OA 3/5/2020
SS-13			Not QA	042004637-0013										OA 3/5/2020
SS-14			Not QA	042004637-0014										OA 3/5/2020
SS-15			Not QA	042004637-0015										OA 3/5/2020
SS-16			Not QA	042004637-0016										OA 3/5/2020
SS-17			Not QA	042004637-0017										OA 3/5/2020
SS-18			Not QA	042004637-0018										OA 3/5/2020
SS-19			Not QA	042004637-0019										OA 3/5/2020
SS-01			LD	042004637-0001A										JP 3/5/2020 - Inter-analyst C
SS-07			LD	042004637-0007A										AB 3/5/2020 - Intra-analyst (
SS-12			LD	042004637-0019	CH	W	C	+	N	P	1.551	1.554	L	AG 3/5/2020 - Inter-analyst

R35754_EMSL04_042004637_03-06-20_soil_PLM.idam
National Asbestos Data Entry Spreadsheet (NADES) for Bulk & Soil Analysis by PLM Visual Estimation
ANALYTICAL REPORT
FILE NAME: R35754_EMSL04_042004637_03-06-20_soil_PLM.idam

PROJECT INFORMATION			ANALYSIS INFORMATION			ABBREVIATIONS / NOTES
Site/Project Name:	R35754	Lab Name: EMSL04	Method:	Analysis By: Non-R	Date Entry Date: 3/6/2020	QA Valid QA Types:
State/Federal Site/Project Identifier:	R35754	Lab Job Number: 042004637		Analysis Date: 3/6/2020	QA by: [redacted]	Std QA - test a QA sample
Site/Project Identifier Code:	R35754	Date Received by lab: 02/21/20	EPA 600 VE	Data Entry by: Non-responsiv	QA Date: 3/10/2020	LB - Lab Duplicate

QA Valid QA Types:
Std QA - test a QA sample
LB - Lab Duplicate

ID Visible Mineral Types: AC - actinolite AB - anxite AR - anthophyllite CH - chrysotile CR - crocidolite TR - tremolite WRTA - winchite/richterite/winchite/actinolite OA - other amphibole RAM - non-asbestos material - OM - other mineral type (specify in "other mineral description" field)

ID OM Detection Standard Reactions: Tecnai (Fonda)

Enter percentages as a value, not a fraction (Example: Enter 50% as 50, not 0.50)

Client Sample Number	Sample Type	Index Suffix Char	Index Suffix No.	QA Type (s)	Lab Sample Number	Sample Appearance	Bulk Material	Base Mineral Type of Reference Materials (%)	Actinolite (AC)			Asbestos (AS)			Anthophyllite (AN)			Chrysotile (CH)			Crocidolite (CR)			Tremolite (TR)			Winchite/Richterite (WRTA)		Other Amphiboles (OA)			Non-Asbestos Material (RAM)			Other Mineral Type (OM)			Duplicate?	Comments
									Qual	AC-AF (%)	AC-MF (%)	Qual	AS-AF (%)	AS-MF (%)	Qual	AN-AF (%)	AN-MF (%)	Qual	CH-AF (%)	CH-MF (%)	Qual	CR-AF (%)	CR-MF (%)	Qual	TR-AF (%)	TR-MF (%)	Qual	WRTA-AF (%)	WRTA-MF (%)	Qual	OA-AF (%)	OA-MF (%)	Qual	NAM-AF (%)	NAM-MF (%)	Qual	OM-AF (%)	OM-MF (%)	OM Type ID		
59-01	Bot			Std QA	042004637-0001	Brown-Non-Fib	Actinolite	AC	U			U			U			U			U			U			U		U			U			U			No	AB 3/4/2020
59-02	Bot			Std QA	042004637-0002	Brown-Non-Fib	Actinolite	AC	U			U			U			U			U			U			U		U			U			U			No	AB 3/4/2020
63-01	Bot			Std QA	042004637-0003	Brown-Non-Fib	Actinolite	AC	U			U			U			U			U			U			U		U			U			U			No	AB 3/4/2020
63-26	Bot			Std QA	042004637-0004	Brown-Non-Fib	Actinolite	AC	U			U			U			U			U			U			U		U			U			U			No	AB 3/4/2020
63-03	Bot			Std QA	042004637-0007	Brown-Non-Fib	Actinolite	AC	U			U			U			U			U			U			U		U			U			U			No	AB 3/4/2020
59-06	Bot			Std QA	042004637-0005	Brown-Non-Fib	Actinolite	AC	U			U			U			U			U			U			U		U			U			U			No	AB 3/5/2020
59-07	Bot			Std QA	042004637-0006	Brown-Non-Fib	Actinolite	AC	U			U			U			U			U			U			U		U			U			U			No	NB 3/5/2020
59-08	Bot			Std QA	042004637-0008	Brown-Non-Fib	Actinolite	AC	U			U			U			U			U			U			U		U			U			U			No	AB 3/5/2020
59-09	Bot			Std QA	042004637-0009	Brown-Non-Fib	Actinolite	AC	U			U			U			U			U			U			U		U			U			U			No	AB 3/5/2020
59-10	Bot			Std QA	042004637-0010	Brown-Non-Fib	Actinolite	AC	U			U			U			U			U			U			U		U			U			U			No	QA 3/5/2020
59-11	Bot			Std QA	042004637-0011	Brown-Non-Fib	Actinolite	AC	U			U			U			U			U			U			U		U			U			U			No	QA 3/5/2020
59-12	Bot			Std QA	042004637-0012	Brown-Non-Fib	Tremolite	TR	U			U			U			U			U			U			U		U			U			U			No	>5-7% CH - QA 3/5/2020
59-13	Bot			Std QA	042004637-0013	Brown-Non-Fib	Tremolite	TR	U			U			U			U			U			U			U		U			U			U			No	QA 3/5/2020
59-14	Bot			Std QA	042004637-0014	Brown-Non-Fib	Tremolite	TR	U			U			U			U			U			U			U		U			U			U			No	QA 3/5/2020
59-15	Bot			Std QA	042004637-0015	Brown-Non-Fib	Tremolite	TR	U			U			U			U			U			U			U		U			U			U			No	QA 3/5/2020
59-16	Bot			Std QA	042004637-0016	Brown-Non-Fib	Tremolite	TR	U			U			U			U			U			U			U		U			U			U			No	QA 3/5/2020
59-17	Bot			Std QA	042004637-0017	Brown-Non-Fib	Tremolite	TR	U			U			U			U			U			U			U		U			U			U			No	QA 3/5/2020
59-18	Bot			Std QA	042004637-0018	Brown-Non-Fib	Tremolite	TR	U			U			U			U			U			U			U		U			U			U			No	QA 3/5/2020
59-19	Bot			Std QA	042004637-0019	Brown-Non-Fib	Tremolite	TR	U			U			U			U			U			U			U		U			U			U			No	QA 3/5/2020
59-01	Bot			LD	042004637-0004	Brown-Non-Fib	Tremolite	TR	U			U			U			U			U			U			U		U			U			U			No	AP 3/5/2020 - inter-analyst QC
59-07	Bot			LD	042004637-0005	Brown-Non-Fib	Actinolite	AC	U			U			U			U			U			U			U		U			U			U			No	AB 3/5/2020 - inter-analyst QC
59-12	Bot			LD	042004637-0012	Brown-Non-Fib	Actinolite	AC	U			U			U			U			U			U			U		U			U			U			No	>5-7% CH - AB 3/5/2020 - inter-analyst QC

R35754_EMSL04_042004637_03-05-20_soil_PLM.xlsm

National Asbestos Data Entry Spreadsheet (NADES) for Bulk & Soil Analysis by PLM Point Count

Site or Project Name: R35754
State/Federal Site or Project Identifier: R35754
Site/Project Identifier Code: R35754
Lab Name: EMSL04
Lab Job No: 042004637
Date received by lab: 02/21/20
Analyzed by: [redacted]
Analysis Date: 3/5/2020

Point Count Method: EPA 600_R-

Data Entry by: [redacted]
Data Entry Date: 3/9/2020
QA by: B. Beaty
QA Date: 3/10/2020

ABBREVIATED NOTES:

(a) Valid QA Types:

Not QA	Not a QA sample
LD	Lab Duplicate

(b) Valid Mineral Types:

AC	actinolite	WRTA	winchite/richterite/tremolite/actinolite
AM	amosite	OA	other amphibole
AN	anthophyllite	NAM	non-asbestos material
CH	chrysotile	OM	other mineral type
CR	crocidolite		
TR	tremolite		

(c) *OM Description Standard Selections:*
Talcorite
Erionite

Client Sample Number	Sample Type	Index Suffix ID	QA Type (a)	Lab Sample Number	Sample Appearance	Points Counted	Counts for each mineral type (b)											Validation Qualifier	Comments
							AC	AM	AN	CH	CR	TR	WRTA	OA	NAM	OM	OM Type (c)		
SS-01	Soil		Not QA	042004637-0001	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	AB 3/5/2020
SS-02	Soil		Not QA	042004637-0002	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	AB 3/5/2020
SS-03	Soil		Not QA	042004637-0003	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	AB 3/5/2020
SS-04	Soil		Not QA	042004637-0004	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	AB 3/5/2020
SS-05	Soil		Not QA	042004637-0005	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	AB 3/5/2020
SS-06	Soil		Not QA	042004637-0006	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	AB 3/5/2020
SS-07	Soil		Not QA	042004637-0007	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	AB 3/5/2020
SS-08	Soil		Not QA	042004637-0008	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	AB 3/5/2020
SS-09	Soil		Not QA	042004637-0009	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	AB 3/5/2020
SS-10	Soil		Not QA	042004637-0010	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	OA 3/5/2020
SS-11	Soil		Not QA	042004637-0011	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	OA 3/5/2020
SS-12	Soil		Not QA	042004637-0012	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	<0.25% CH - OA 3/5/2020
SS-13	Soil		Not QA	042004637-0013	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	OA 3/5/2020
SS-14	Soil		Not QA	042004637-0014	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	OA 3/5/2020
SS-15	Soil		Not QA	042004637-0015	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	OA 3/5/2020
SS-16	Soil		Not QA	042004637-0016	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	OA 3/5/2020
SS-17	Soil		Not QA	042004637-0017	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	OA 3/5/2020
SS-18	Soil		Not QA	042004637-0018	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	OA 3/5/2020
SS-19	Soil		Not QA	042004637-0019	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	OA 3/5/2020
SS-01	Soil		LD	042004637-0001A	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	JP 3/5/2020 - Inter-analyst QC
SS-07	Soil		LD	042004637-0007A	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	AB 3/5/2020 - Intra-analyst QC
SS-12	Soil		LD	042004637-0012A	Brown-Non-Fibrous-Homogeneous	400	0	0	0	0	0	0	0	0	0	0		UJ	<0.25% CH - AG 3/5/2020 - Inter-analyst QC

R35754_EMSL04_042004637_03-05-20_soil_PLM.xlsm

National Asbestos Data Entry Spreadsheet (NADES) for Bulk & Soil Analysis by PLM Point Count

ANALYTICAL REPORT

FILE NAME: R35754_EMSL04_042004637_03-05-20_soil_PLM.xlsm

PROJECT INFORMATION		ANALYSIS INFORMATION			ABBREVIATED NOTES	
Site/Project Name:	R35754	Method: EPA 600_PC	Analysis By:	Non-respo	(a) Valid QA Types:	(b) Valid Mineral Types:
State/Federal Site/Project Identifier:	R35754		Analysis Date:	3/5/2020	Not QA - Not a QA sample	AC - actinolite AM - amosite AN - anthophyllite
Site/Project Identifier Code:	R35754		Data Entry by:	Non-responsive	LD - Lab Duplicate	CH - chrysotile CR - crocidolite TR - tremolite
Lab Name:	EMSL04		Data Entry Date:	3/9/2020	(c) OM Description Standard Selections:	WRTA - winchite/richterite/tremolite/actinolite
Lab Job Number:	042004637		QA by:	Non-respo	Taconite Erionite	OA - other amphibole NAM - non-asbestis material
Date Received by lab:	02/21/20		QA Date:	3/10/2020		OM - other mineral type (specify in "other mineral description" field)

Client Sample ID	Sample Type	Index Suffix ID	QA Type (a)	Lab Sample ID	Sample Appearance	Points Counted	Grav. Reduction		Concentration (%) for each mineral type (b)										OM Type (b)	Total (%)
							Ash fraction	Acid Fraction	AC	AM	AN	CH	CR	TR	WRTA	OA	NAM	OM		
SS-01	Soil		Not QA	042004637-0001	Brown-Non-Fib	400	1.000	1.000												0.0
SS-02	Soil		Not QA	042004637-0002	Brown-Non-Fib	400	1.000	1.000												0.0
SS-03	Soil		Not QA	042004637-0003	Brown-Non-Fib	400	1.000	1.000												0.0
SS-04	Soil		Not QA	042004637-0004	Brown-Non-Fib	400	1.000	1.000												0.0
SS-05	Soil		Not QA	042004637-0005	Brown-Non-Fib	400	1.000	1.000												0.0
SS-06	Soil		Not QA	042004637-0006	Brown-Non-Fib	400	1.000	1.000												0.0
SS-07	Soil		Not QA	042004637-0007	Brown-Non-Fib	400	1.000	1.000												0.0
SS-08	Soil		Not QA	042004637-0008	Brown-Non-Fib	400	1.000	1.000												0.0
SS-09	Soil		Not QA	042004637-0009	Brown-Non-Fib	400	1.000	1.000												0.0
SS-10	Soil		Not QA	042004637-0010	Brown-Non-Fib	400	1.000	1.000												0.0
SS-11	Soil		Not QA	042004637-0011	Brown-Non-Fib	400	1.000	1.000												0.0
SS-12	Soil		Not QA	042004637-0012	Brown-Non-Fib	400	1.000	1.000												0.0
SS-13	Soil		Not QA	042004637-0013	Brown-Non-Fib	400	1.000	1.000												0.0
SS-14	Soil		Not QA	042004637-0014	Brown-Non-Fib	400	1.000	1.000												0.0
SS-15	Soil		Not QA	042004637-0015	Brown-Non-Fib	400	1.000	1.000												0.0
SS-16	Soil		Not QA	042004637-0016	Brown-Non-Fib	400	1.000	1.000												0.0
SS-17	Soil		Not QA	042004637-0017	Brown-Non-Fib	400	1.000	1.000												0.0
SS-18	Soil		Not QA	042004637-0018	Brown-Non-Fib	400	1.000	1.000												0.0
SS-19	Soil		Not QA	042004637-0019	Brown-Non-Fib	400	1.000	1.000												0.0
SS-01	Soil		LD	042004637-0001A	Brown-Non-Fib	400	1.000	1.000												0.0
SS-07	Soil		LD	042004637-0007A	Brown-Non-Fib	400	1.000	1.000												0.0
SS-12	Soil		LD	042004637-0012A	Brown-Non-Fib	400	1.000	1.000												0.0

EMSL Analytical, Inc.
200 Route 130 North Cinnaminson, NJ 08077
Phone/Fax: (800) 220-3675 / (856) 786-5974
http://www.EMSL.com / cinnasblab@EMSL.com

EMSL Order: 042004637
Customer ID: TCHL75
Customer PO:
Project ID:

Attention: [redacted]
TechLaw Inc.
139 Peninsula St.
Wheeling, WV 26003

Project: DAS #R35754

Phone: (304) 230-1230
Fax:
Received: 02/21/2020 10:40 AM
Analysis Date: 03/05/2020
Collected: 02/19/2020

Test Report: Asbestos Analysis of Bulk Building Materials via EPA 600/R-93/116 Method using PLM and Milling Prep. Quantitation using 400 Point Count Procedure

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
SS-11 *042004637-0011*	P-10 - R35754-11 / 3-1081	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
SS-12 *042004637-0012*	P-11 - R35754-12 / 3-1084	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**<0.25% Chrysotile**
SS-13 *042004637-0013*	P-12 - R35754-13 / 3-1087	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
SS-14 *042004637-0014*	P-12 - R35754-14 / 3-1090	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
SS-15 *042004637-0015*	P-13 - R35754-15 / 3-1093	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
SS-16 *042004637-0016*	P-14 - R35754-16 / 3-1096	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
SS-17 *042004637-0017*	B-15 - R35754-17 / 3-1099	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
SS-18 *042004637-0018*	B-16 - R35754-18 / 3-1102	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
SS-19 *042004637-0019*	B-17 - R35754-19 / 3-1105	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**

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Samples analyzed by EMSL Analytical, Inc. Cinnaminson, NJ NVLAP Lab Code 101048-0, AIHA-LAP, LLC-IHLAP Lab 100194, NYS ELAP 10872, NJ DEP 03036, PA ID# 68-00367

Initial report from: 03/06/2020 09:29:15

EMSL Analytical, Inc.
200 Route 130 North Cinnaminson, NJ 08077
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http://www.EMSL.com / cinnasblab@EMSL.com

EMSL Order: 042004637
Customer ID: TCHL75
Customer PO:
Project ID:

Attention: Non-responsive based on n4
TechLaw Inc.
139 Peninsula St.
Wheeling, WV 26003

Project: DAS #R35754

Phone: (304) 230-1230
Fax:
Received: 02/21/2020 10:40 AM
Analysis Date: 03/05/2020
Collected: 02/19/2020

Test Report: Asbestos Analysis of Bulk Building Materials via EPA 600/R-93/116 Method using PLM and Milling Prep. Quantitation using 400 Point Count Procedure

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
SS-01 *042004637-0001*	P-01 - R35754-01 / 3-1050	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
SS-02 *042004637-0002*	P-02 - R35754-02 / 3-1054	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
SS-03 *042004637-0003*	P-03 - R35754-03 / 3-1057	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
SS-04 *042004637-0004*	P-03 - R35754-04 / 3-1060	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
SS-05 *042004637-0005*	P-04 - R35754-05 / 3-1063	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
SS-06 *042004637-0006*	P-05 - R35754-06 / 3-1066	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
SS-07 *042004637-0007*	P-06 - R35754-07 / 3-1069	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
SS-08 *042004637-0008*	P-07 - R35754-08 / 3-1072	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
SS-09 *042004637-0009*	P-08 - R35754-09 / 3-1075	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
SS-10 *042004637-0010*	P-09 - R35754-10 / 3-1078	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**

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Samples analyzed by EMSL Analytical, Inc. Cinnaminson, NJ NVLAP Lab Code 101048-0, AIHA-LAP, LLC-IHLAP Lab 100194, NYS ELAP 10872, NJ DEP 03036, PA ID# 68-00367

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Attention: Non-responsive based on re
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Phone: (304) 230-1230
Fax:
Received: 02/21/2020 10:40 AM
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Project: DAS #R35754

Test Report: Asbestos Analysis of Bulk Building Materials via EPA 600/R-93/116 Method using PLM and Milling Prep. Quantitation using 400 Point Count Procedure

			Non-Asbestos		Asbestos
Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Type

Non-responsive based on revised scope
Non-responsive based on revised scope

Analyst(s)

Non-responsive based on revised scope
Non-responsive based on revised scope
Non-responsive based on revised scope
Non-responsive based on revised scope
Non-responsive based on revised scope

Non-responsive based on revised scop Laboratory Manager
or other approved signatory

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